

AO 91 (Rev. 08/09) Criminal Complaint

FILED  
JOHN J. JERMAN

## UNITED STATES DISTRICT COURT

13 OCT -2 AM 9:38

for the

Southern District of Ohio

United States of America

v.

DIMITAR ANGELOV

Case No.

1:13MJ -606

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 28, 2013 in the county of Hamilton in the  
Southern District of Ohio, the defendant(s) violated:

## Code Section

18 U.S.C. 1029(a)(8)  
18 U.S.C. 371

## Offense Description

Fraud and related activity in connection with access devices  
Conspiracy

This criminal complaint is based on these facts:

See Affidavit of SA Steven McKenna.

☒ Continued on the attached sheet.

Complainant's signature

Steven McKenna, Special Agent - USSS

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/2/13

Judge's signature

City and state: Cincinnati, Ohio

U.S. Magistrate Judge Karen Litkovitz

Printed name and title

**AFFIDAVIT IN SUPPORT OF**  
**A CRIMINAL COMPLAINT**

I, Steven W. McKenna, being duly sworn, hereby depose and state the following:

**INTRODUCTION AND AGENT BACKGROUND**

- 1) I am a Special Agent with the United States Secret Service (USSS) and I have been so employed since December of 2004. I have received training on conducting investigations involving violations of federal law. I am currently assigned to the United States Secret Service Cincinnati Field Office and have been assigned to participate in investigations involving violations of federal law. Prior to my employment as a Special Agent in United States Secret Service, I was employed for 3 years as a sworn Uniformed Officer with the United States Secret Service.
- 2) This affidavit is being submitted to support the issuance of a criminal complaint against Dimitar A. ANGELOV and Dimitar KOLEV, currently incarcerated in the Hamilton County (OH) Justice Center, who, knowingly and with the intent to defraud had control or custody of a scanning receiver, in violation of 18 U.S.C. § 1029(a)(8), Access Device Fraud. They also conspired to violate 18 U.S.C. § 1029(a)(8), in violation of 18 U.S.C. § 371.
- 3) Because this affidavit is provided for the limited purpose of establishing probable cause to support an arrest warrant, I have not included all details of all aspects of this investigation, but rather set forth only those facts that I believe are necessary to establish probable cause. The following information is known to me or was reported to me by law enforcement officers involved in this investigation and/or cooperating individuals.

**Summary**

- 4) On September, 28 2013, Springdale (OH) Police Officers responded to a call of service of two suspicious individuals in a white Toyota Corolla, in an adjacent parking lot to a Kemba Credit Union ATM. The subjects were seen individually walking to the ATM and returning to the vehicle. The vehicle was located and stopped a few minutes later and a strong odor of marijuana was detected. Officers were given consent to search the vehicle and discovered evidence of possible credit card fraud. A bank employee discovered a skimming device and a pin hole camera device attached to the ATM. Video surveillance was recovered that showed individuals matching the description of the subjects in the white Toyota Corolla at the ATM. Dimitar AENGLOV and Demitar KOLEV were taken into custody and the vehicle was towed to the Springdale Police Station. A local search warrant was executed on the vehicle and a similar skimming device was located

along with other items generally used by individuals who conduct access device fraud.

**PROBABLE CAUSE**

- 5) Based on my experience and training, card skimming is a type of scheme in which credit card and bank card information is stolen or "skimmed" at automatic teller machines ("ATMs") in order to defraud credit card companies and banks, often through the creation of duplicate, counterfeit credit cards. ATM skimming schemes often involves the use of certain tools such as a scanning receiver. The scanning receiver, or "skimmer," is device used to capture and store the victim's credit card information to be transferred and used later by an unauthorized party.
- 6) Pursuant to 18 U.S.C. § 1029(e)(8), a "scanning receiver" is defined as a "device or apparatus that can be used to intercept a wire or electronic communication in violation of chapter 119 or to intercept an electronic serial number, mobile identification number, or other identifier of any telecommunications service, equipment, or instrument."
- 7) On September, 28 2013, Springdale (OH) Police Officers responded to a call of service, of two suspicious individuals, in a white Toyota Corolla, IL tag#L388215, in the parking lot located at 175 Tri-County Parkway, Springdale, Ohio. The caller stated the two subjects parked on the far side of the building, hung around for several minutes adjusting their jackets. One of the subjects crossed the street, walked past 175 Tri-County Parkway, crossed back across the street to the lot of Kemba Credit Union located at 211 Northland Blvd, and went to the ATM. The subject then returned to the Corolla in the same manner. Once he returned, they hung around for several more minutes, adjusting their jackets and the other male subject walked to the ATM in the same manner. They drove off just before officers arrived.
- 8) Officer Abell spotted the vehicle leaving the parking lot located at 200 Northland Blvd, Springdale, OH, which is across the street from the Kemba Credit Union, heading back towards Tri-County Parkway. Officer Warren and Sgt. Davis stopped the vehicle on SR 747 as it pulled into the parking lot of Cassanelli Square.
- 9) As the stop was made, both occupants took items off their heads. The driver took off a wig and sunglasses, throwing the wig into rear seat. The passenger took off a hat and threw it into the rear seat.
- 10) Officers approached the vehicle and spoke with the driver, who provided an IL ID with name Dimitar Angelov ANGELOV. The passenger provided an IL OL under the name Dimitar KOLEV.



- 11) The officers observed a strong odor of marijuana emanating from the passenger compartment of the vehicle.
- 12) ANGELOV was asked about what he was doing on Tri-County Parkway. He stated they were just hanging out. When asked about Kemba and the ATM, they denied going anywhere near an ATM, and again said they were just hanging out. ANGELOV stated they were from Chicago and were headed back to Chicago. When asked what they were doing in Cincinnati, he replied they were looking to purchase a truck. When asked about the marijuana, he stated that they do use marijuana. When asked if they had any in the car, he said yes, and showed a folded piece of paper with some residue on it. When asked if they had anymore, he replied no. ANGELOV stated "in Chicago they were allowed to have up to an ounce without any problem."
- 13) ANGELOV then gave consent to Officer Warren to search the vehicle. Both men were removed from the vehicle and placed into patrol cars. During the search of the vehicle, a baggie containing a small amount of marijuana was found in the center console, along with other baggies and paper with marijuana residue. Some paraphernalia was also found in a cubby hole in the center dash.
- 14) During the search, numerous prepaid credit cards and other similar cards with electronic information strips were found. Some of the cards had masking tape on the back of the card with hand written four digit numbers on the tape. Officers also observed 2 laptop computers and numerous electronic cords, one of which was rigged with alligator clips and "pig tail" wires. The car was towed to the Springdale Police department.
- 15) A representative from Kemba Credit Union was contacted and responded to the bank's ATM at Kemba. The ATM was examined and a skimming device was located on the card slot of the machine. There was also a device located over the cash dispenser that appeared to have a camera in it. This device was also equipped with a USB cable.
- 16) Surveillance video photos were obtained and examined from Kemba Credit Union. The photo depicts a subject wearing a coat, similar to the coat worn by Dimitar Angelov ANGELOV at the time of the traffic stop, at the ATM. The photos also showed another subject wearing a coat that matched a coat that was lying in the rear seat of the car.
- 17) A Hamilton County (OH) Municipal Court Search Warrant was signed and executed on the white Toyota Corolla, bearing IL tag#L388215.

- 18) Inside the Toyota Corolla, items were recovered that are consistent with items that individuals use who conduct access device fraud. Among these items: a skimming device artificially attached to a piece of an ATM, a circuit board (similar to the one found at the Kemba Credit Union), two laptop computers, numerous prepaid credit/gift cards (some of which contained masking tape with had written four digit numbers on the back), a soldering iron (wire), pry bar, box cutter, gloves and a wig.

### CONCLUSION

- 19) Based on the foregoing facts set forth in this affidavit, there is probable cause to believe that Dimitar A. ANGELOV and Dimitar KOLEV knowingly and with the intent to defraud had control or custody of a scanning receiver, in violation of 18 U.S.C. § 1029(a)(8), Access Device Fraud. There is also probable cause to believe that they conspired to violate 18 U.S.C. § 1029(a)(8), in violation of 18 U.S.C. § 371.

Further your affiant sayeth naught.



Steven W. McKenna,  
Special Agent, United States Secret Service

Subscribed and sworn to before me on this 2<sup>nd</sup> day of October 2013. *ku*



United States Magistrate Judge